

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO.: 04-40113-FDS

ELIZABETH R. STEFFENBERG,)	(BBO#639293)
Plaintiff,)	
)	
v.)	
)	
T. GENE GILMAN, STEVEN GILMAN,)	
THE GILMAN INSURANCE)	
AGENCY, INC., DAVID M. SCOLL,)	
ARBOR SECURITIES, LTD.,)	
ALLIANCE INVESTMENT)	
MANAGEMENT, COMMONWEALTH)	
FINANCIAL HOLDINGS INC.,)	
FINANCIAL LINKS, INC.,)	
T. GILMAN & CO., LTD.,)	
FIRST ALLIED SECURITIES, INC.,)	
PENSON FINANCIAL SERVICES, INC.,)	
AVIVA USA CORPORATION,)	
TRADETEK, LTD., and)	
TRADETEK, LLC,)	
Defendants.)	

AFFIDAVIT OF LOUIS M. CIAVARRA, ESQUIRE

I, Louis M. Ciavarra, Esquire, hereby state the following to be true to the best of my knowledge, information and belief:

1. I am an attorney in good standing in the Commonwealth of Massachusetts. I am a partner with the law firm of Bowditch & Dewey, LLP, 311 Main Street, Worcester, Massachusetts. This firm represents Plaintiff, Elizabeth R. Steffenberg ("Mrs. Steffenberg"), in the above-entitled matter.

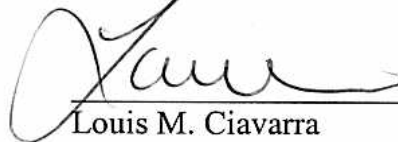
2. I am familiar with the history of the course of this litigation, and I make this Affidavit based upon my own personal knowledge.

3. We have included as Defendants in this case Mr. T. Gene Gilman ("Gene Gilman") and the various companies he controls. To date, they have ignored this matter and have not responded to the Complaint or any other pleadings.

4. I have spoken with an Assistant United States Attorney about Gene Gilman and understand he is under investigation. I have also spoke with Gene Gilman's criminal defense attorney in order to obtain documents in his client's possession concerning the Steffenbergs. To date, counsel for Gene Gilman has been unresponsive to my telephone calls and requests.

5. I believe that the only way we will be able to discover information concerning this case is from those people and companies, such as Defendant David M. Scoll, that did business with Gene Gilman.

Signed under the pains and penalties of perjury this 26 day of August, 2004.



Louis M. Ciavarra